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September 14, 2001

VIA E-MAIL & U.S. MAIL

Mr. Sam McClerren
Illinois Commerce Commission
527 E. Capitol Avenue
Springfield, Illinois 62701

Re: ICC Docket No. 01-0539
Informal Comments Of Verizon

Dear Sam:

Thank you for the opportunity to submit these informal comments concerning proposed Code Part 731. Pursuant to the schedule established at the workshop on August 30, 2001, Verizon North Inc. and Verizon South Inc. (collectively "Verizon") hereby submit these comments, which sets forth the complete list of measures that should be included in proposed Code Part 731. (The list of measures is enclosed with this correspondence.)

As Staff is aware, Verizon already is under a substantial obligation to meet an extensive set of measures relating to the provision of wholesale service as a result of its merger condition 2 and the resulting collaborative effort. These measures describe in detail the standards of service Verizon must provide to competitive local exchange carriers. Indeed, in a recent letter to the Federal Communications Commission, the Illinois Commerce Commission ("ICC" or "Commission") stated that "the Performance and Remedy Plan adopted for Verizon in Illinois is comprehensive." (ICC Comments in CC Docket No. 98-0184, p. 2 (filed August 31, 2001)). The Commission further stated:

[Verizon's] Performance plan adopted in Illinois is uniquely tailored to provide information on Verizon's progress in opening its local network to competition. The reporting requirements eventually adopted represent efficient enhancements to those under the California plan and create sufficient financial incentives for Verizon to provide a higher level of performance in Illinois.

(Id. at 2-3) (emphasis added). Consequently, it is Verizon's position that the measures and standards set forth in both its Performance and Remedy Plan and Carrier to Carrier Plan provide ample protection and monitoring for competitive local exchange carriers. Given the requirements imposed on Verizon pursuant to its Performance and Remedy Plan and Carrier to Carrier Plan (and a similar plan for Ameritech-Illinois), the list of measures to be included in proposed Part 731 should be focused only on those measures

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set forth in the attachment to this correspondence. Generally, parity is the performance standard when a retail comparison exists. To the extent that the state regulates retail performance in any area, wholesale performance will be regulated indirectly via the parity standard.

Thank you again for the opportunity to submit these comments. Verizon stands ready to discuss its position at the workshop scheduled for September 26, 2001. In the event you have any questions about Verizon's position, please call.

Sincerely,

John E. Rooney

JER:hp
Enc.